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Attorneys for all Plaintiffs

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
SOUTHERN DIVISION

JOSEPH COOK, an Individual, )  
LIRVANEETHZA COOK, an Individual, )  
Plaintiffs, )  
v. )  
FULLERTON SUPPORTIVE HOUSING, )  
L.P., A California Limited Partnership; THE )  
JOHN STEWART COMPANY, A California )  
Corporation; and DOES 1 through 10, )  
Inclusive, )  
Defendants )  
\_\_\_\_\_ )

No. 8:19cv00383 PSG (ADSx)

**NOTICE OF ACCEPTANCE OF  
DEFENDANTS' OFFER OF  
JUDGMENT PURSUANT TO  
FEDERAL RULES OF CIVIL  
PROCEDURE RULE 68**

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On September 4, 2020, Defendants Fullerton Supportive Housing, L.P. (Fullerton) and The John Stewart Company (JSC), collectively submitted a Federal Rules of Civil Procedure Rule 68 Offer of Judgment to Plaintiffs Joseph Cook and Lirvaneethza Cook, in the total amount of \$295,000, payable as follows:

1. \$73,750 (Seventy-three thousand seven hundred and seventy dollars) to be paid by

Fullerton to Joseph Cook;

2. \$73,750 (Seventy-three thousand seven hundred and seventy dollars) to be paid by Fullerton to Lirvaneethza Cook;

3. \$73,750 (Seventy-three thousand seven hundred and seventy dollars) to be paid by JSC to Joseph Cook;

4. \$73,750 (Seventy-three thousand seven hundred and seventy dollars) to be paid by JSC to Lirvaneethza Cook.

The Rule 68 offer also states that the sums listed above to be paid by Defendants to Plaintiffs on account of any and all liability claimed in this action, included all costs of suit, statutory penalties, and attorney's fees otherwise recoverable in this action.

The written Rule 68 offer requires acceptance to be made within 14 days of the date of the September 4, 2020, Offer of Judgment.

NOTICE IS HEREBY GIVEN that, pursuant to Federal Rules of Civil Procedure Rule 68, Plaintiffs Joseph Cook and Lirvaneethza Cook hereby accept Defendants Fullerton Supportive Housing, L.P.'s and The John Stewart Company's Offer of Judgment, as herein above referenced.

Dated: September 14, 2020

LAW OFFICES OF CRAIG P. FAGAN

By: /s/Craig P. Fagan  
Craig P. Fagan  
Attorneys for Plaintiffs  
Joseph Cook & Lirvaneethza Cook

PROOF OF SERVICE  
STATE OF CALIFORNIA, COUNTY OF SAN DIEGO

I am, and was at the time of the service hereinafter mentioned, over the age of 18 and not a party to the within action. My business address is 4512 4<sup>th</sup> Street, La Mesa, California, and I am employed in San Diego County, California.

I served the enclosed **NOTICE OF ACCEPTANCE OF DEFENDANTS' OFFER OF JUDGMENT PURSUANT TO FEDERAL RULES OF CIVIL PROCEDURE RULE 68** on August 18, 2020, by serving via email (Service by email has been agreed upon by the parties for the duration of the case due to COVID) to the following:

Tony Cheng  
THE LEE LAW GROUP, PC  
17310 Red Hill Avenue, Suite 350  
Irvine, CA 92614  
[tcheng@leefirm.com](mailto:tcheng@leefirm.com)

Rick Somes  
Heather Whitehead  
TYSON & MENDES  
17885 Von Karman Ave, Suite 450  
Irvine, CA 92614  
[RSomes@TysonMendes.com](mailto:RSomes@TysonMendes.com)  
[HWhitehead@TysonMendes.com](mailto:HWhitehead@TysonMendes.com)

who is/are the person(s) on whom the document(s) was/were to be served in this action.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

/s/Craig P. Fagan  
Craig P. Fagan